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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Federal Communications Commission  
Office of the Secretary

In the Matter of:

Petition of Southwestern Bell Telephone )  
Company to Amend Part 68 of the ) RM-7815  
Commission's Rules to Include Terminal )  
Equipment Connected to Basic Rate Access )  
Services Provided via Integrated )  
Services Digital Network Access )  
Technology )

REPLY  
OF THE  
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association (USTA) respectfully submits this Reply concerning the Petition for Rulemaking filed by Southwestern Bell Telephone Company (Southwestern Bell) on August 23, 1991. Southwestern Bell seeks a rulemaking to amend Part 68 to include terminal equipment (CPE) connected to two wire basic rate access interfaces provided by Integrated Services Digital Network (ISDN) technology. USTA supports the commencement of a rulemaking proceeding. Accommodation of this CPE within Part 68 will sanction the recently adopted ANSI standard, ANSI T1.601, and will reduce the likelihood of network harm as ISDN becomes more widely available.

To USTA's knowledge, all statements filed in response to the October 7 Public Notice support the commencement of a rulemaking proceeding. Filings were made by the BellSouth Companies, the NYNEX Telephone Companies, the Ameritech Operating Companies and

AT&T. The BellSouth Companies and the NYNEX Telephone Companies support commencement of a rulemaking without qualification.

The other two statements filed on the Southwestern Bell Petition for Rulemaking raised a number of issues. AT&T seeks expansion of the rulemaking to address four wire ISDN primary rate access interfaces, and seeks consideration of limitations on encoded analog content and also on signaling interference for the ISDN interfaces. AT&T seeks through gain limitations, but objects to any new longitudinal balance limitations on longitudinal-to-metallic balance. (AT&T asks the Commission to seek recommendations on the through gain limitations issue from the TR-41 Committee of the Telecommunications Industry Association.)

The Ameritech Operating Companies emphasized that the Commission should not preclude ISDN connections through any registered jacks, including the existing RJ-11 jack. They pointed out that requiring a jack change that was not otherwise needed to deliver ISDN service would be costly and burdensome.


These comments still support the commencement of a rulemaking. Any issues raised by the commenters can be addressed in the course of a rulemaking, and the Commission should make reasonable accommodation in any rulemaking notice.

In addition, in anticipation of a rulemaking notice, the relevant groups that may desire to address the identified items, such as possible through gain limitations, should be asked informally by the Commission or commenting parties to be prepared to file comments with any recommendation, or be otherwise put on notice that their input is solicited.

Carriers' increasing commitment to ISDN capability merits prompt action here by the Commission. The Commission should propose a rule, finalizing it in response to comment it receives.

Respectfully submitted,

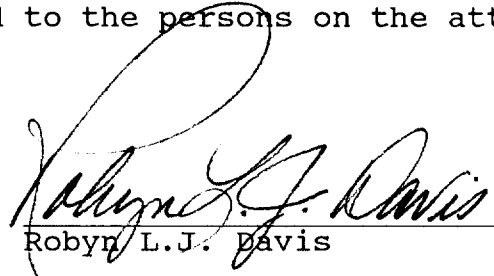
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November 20, 1991

**CERTIFICATE OF SERVICE**

I, Robyn L.J. Davis, do certify that on November 20, 1991 copies of the foregoing Reply of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.

  
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